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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAR 03 2000

REPLY TO THE ATTENTION OF

MEMORANDUM

SUBJECT: ACTION MEMORANDUM - Request for an Emergency Removal Action at the American Chemical Services, Inc. Site, Griffith, IN (Site ID #05J7)

FROM: William W. Simes, On-Scene Coordinator
Emergency Response Branch - Section #3

TO: Richard Karl, Chief
Emergency Response Branch

THRU: Linda Nachowicz, Chief
Emergency Response Section #8

I. PURPOSE

The purpose of this memorandum is to request and document your approval to expend up to \$25,000 in order to abate a substantial threat to public health and the environment at the American Chemical Services, Inc.(ACS) site located in Lake County, Griffith, Indiana (hereinafter referred to as the Site).

This response action will be performed under Section 104 of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA).

This site is on the National Priorities List.

II. SITE CONDITIONS AND BACKGROUND

CERCLIS ID # IND016360265

The Site is located at 420 S. Colfax Ave., Griffith, Indiana. ACS operated a chemical manufacturing facility which involved solvent recovery in Griffin, Indiana. Land use in the area is predominately residential and industrial with a wetlands area located north of the Chesapeake and Ohio railway on the west of the site. The longitude is 87°25'58" west; the latitude is 41°30'38" north.

The Site is bordered on the east side by Colfax Ave. and the south and west by the town of Griffith landfill and Public works. The north boundary is the Chesapeake and Ohio railway property. The facility began operations in the early 1960s and continued solvent recovery operations until 1990 when ACS lost interim status under the Resource Conservation and Recovery Act (RCRA) regulations because of failure to obtain required insurance policies. The

state had responded to complaints since 1972.

In Indiana, the low-income percentage is 29% and the minority percentage is 10%. To meet the Environmental Justice (EJ) concern criteria, the area within 1 mile of the site must have a population that's twice the state low-income percentage and/or twice the state minority percentage. That is, the area must be at least 58% low-income and/or 20% minority. At this site, the low-income percentage is 21.6% and the minority is 2.37% as determined by Arcview or Landvview III EJ analysis. Therefore, this site does not meet the region's EJ criteria based on demographics as identified in "Region 5 interim Guidelines for Identifying and Addressing a Potential EJ Case, June 1998".

In 1992 a Record of Decision (ROD) was completed and a Consent Agreement was signed by the ACS Potentially Responsible Parties (PRP)s, and Remedial Design and some remedial actions has begun on the site. While installing a subsurface barrier wall, drums were found along the south end of the site near a pipeline. The PRPs contacted the Remedial Project Manager, Kevin Adler, to inform him that they did not have the expertise to remove the drums without damaging the pipeline.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

The time critical response action at the Site needs to be undertaken to abate the threat to public health and the environment posed by the potential release and combustion of hazardous and flammable materials. The National Contingency Plan (NCP) provides specific criteria for evaluation of a threat and the appropriateness of a removal action in 40 CFR § 300.415.

The ACS site meets the NCP criteria for a time critical removal action.

A) Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants.

Soil samples at the site contain various organic chemicals, including benzene, chloroform, isophorone, phthalate, polychlorinated biphenyls (PCBs), toluene, trichloroethylene and xylene. Due to the large number of soil and drum samples taken by the PRPs and the high levels of contamination found in the drums that were excavated on site, it can be assumed that the drums that will be excavated in this action will contain high levels of hazardous substances, pollutants

or contaminates. Bioaccumulation of these hazardous substances, pollutants or contaminates could enter the food chain.

B) Actual or potential contamination of drinking water supplies or sensitive ecosystems.

Investigation of the ACS site has already demonstrated that groundwater contamination has migrated from the site. Several residential wells east and south of the site have been shown to be contaminated with organic compounds originating from the ACS site. The drums are located outside the barrier wall installed by the PRPS and could cause further contamination.

C) Hazardous substances or pollutants in drums, barrels, tanks, or other bulk storage containers, that pose a threat of release.

The ACS site contains buried steel drums. The drums have degraded with time and it is unknown whether the drums have released their contents into the soil or groundwater.

D) Threat of fire or explosion;

Contents of the buried drums are unknown. Based on data from other drums excavated elsewhere on the property, these drums may contain flammable and combustible compounds which would present a fire and explosion hazard.

IV. ENDANGERMENT DETERMINATION

Given the site conditions, the nature of the hazardous substances on-site, and the potential exposure pathways to nearby populations described in Sections II and III above, failure to implement the time critical action set forth in this Action Memorandum may result in an imminent and substantial endangerment to public health, or welfare, or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

The response actions described in this Action Memorandum will directly address volatile organic compounds, and other pollutants at the site which pose an imminent and substantial endangerment to public health or welfare or the environment. Specifically, the following removal activities will be accomplished:

- 1) Develop and implement a site Health and Safety Plan;

- 2) Excavate drums and contaminated soil;
- 3) Overpack drum contents;
- 4) Secure the overpacked drums and turn them over to the PRPs..

Response activities under this Action Memorandum will require one week to complete. The threats posed by identified hazardous waste materials meet the criteria listed in 40 CFR § 300.415(b)(2) of the NCP, and are consistent with the removal action to be performed.

The OSC has planned for the provision of post-removal site control, consistent with the provisions of 40 CFR § 300.415(k) of the NCP.

The response actions described in this memorandum directly address actual or threatened releases of hazardous substances, pollutants, or contaminants at the site which pose an imminent and substantial endangerment to public health and safety and the environment. These response actions do not impose a burden on the affected property disproportionate to the extent to which that property contributed to the conditions being addressed.

The detailed cleanup contractor costs are presented in Attachment 1 and estimated project costs are summarized below:

REMOVAL PROJECT CEILING ESTIMATE

EXTRAMURAL COSTS:

Cleanup Contractor Costs	\$ 14,250
Contingency (20%)	2,850
Subtotal	<u>\$ 17,100</u>
Total START, including multiplier	\$ 2,000
Extramural Subtotal	<u>\$ 19,100</u>
Extramural Contingency (15%)	\$ 2,865
 TOTAL, EXTRAMURAL COSTS	 <u>\$ 21,965</u>

INTRAMURAL COSTS:

U.S. EPA Direct Costs	
\$30 x (32 Regional hours plus 4 HQ hours)	\$ 1,080

U.S. EPA Indirect Costs
(\$65 x 32 Regional hours)

\$ 2,080

TOTAL, INTRAMURAL COSTS \$ 3,160

TOTAL REMOVAL PROJECT CEILING ESTIMATE: \$ 25,000

All applicable or relevant and appropriate requirements (ARARs) will be complied with to the extent practicable.

Time critical response activities performed pursuant to this Action Memorandum shall, to the extent practicable considering the exigencies of the situation, attain ARARs identified by the Indiana Department of Environmental Management (IDEM).

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

Delayed action or non-action will result in the increased likelihood of a direct contact threat to human or wildlife populations accessing the site and the possible degradation of local groundwater and surface water conditions. In addition, there is the possibility of a fire or explosion which could affect nearby homes and the local population.

VII. OUTSTANDING POLICY ISSUES

No outstanding policy issues are foreseen at this time.

VIII. ENFORCEMENT

For administrative purposes, information concerning the enforcement strategy for this site is contained in an Enforcement Confidential Addendum.

IX. RECOMMENDATIONS

This decision document represents the selected removal action for the ACS site, Griffith, Lake County, Indiana. It was developed in accordance with CERCLA, 42 U.S.C. §9601 et seq. as amended, and is not inconsistent with the NCP. This decision is based on the Administrative Record for the site. Conditions at the site meet the NCP, 40 CFR § 300.415 (b) (2) criteria for a removal, and I recommend your approval of this emergency removal action. The total project ceiling, if approved, will be \$25,000. Of this, an estimated \$22,000 may be used for cleanup contractor costs. You may indicate your decision by signing below.

APPROVAL:

⁶
[Signature] for Rk DATE: 3/3/00
CHIEF, EMERGENCY RESPONSE BRANCH

DISAPPROVAL: _____

DATE: _____

CHIEF, EMERGENCY RESPONSE BRANCH

Confidential Enforcement Addendum

Attachments

1. Cleanup Contractor Cost Estimate
2. Index of the Administrative Record

cc: K. Mould, U.S. EPA, OERR, 5202-G
M. Chezik, U.S. Dept. of the Interior
H. Atkinson, IDEM

BCC PAGE

REDACTED

1 PAGE

NOT RELEVANT TO THE SELECTION OF REMOVAL ACTION

AMERICAN CHEMICAL SERVICE, INC. SITE

ENFORCEMENT ADDENDUM

REDACTED

2 PAGES

NOT RELEVANT TO THE SELECTION OF REMOVAL ACTION

ATTACHMENT 1

**DETAILED CLEANUP CONTRACTOR COST ESTIMATE
AMERICAN CHEMICAL SERVICES SITE**

FEBRUARYY 2000

The estimated cleanup contractor costs are as follows:

Personnel	\$ 3,140
Equipment	2,710
Subcontractors	8,400
Total	\$14,250

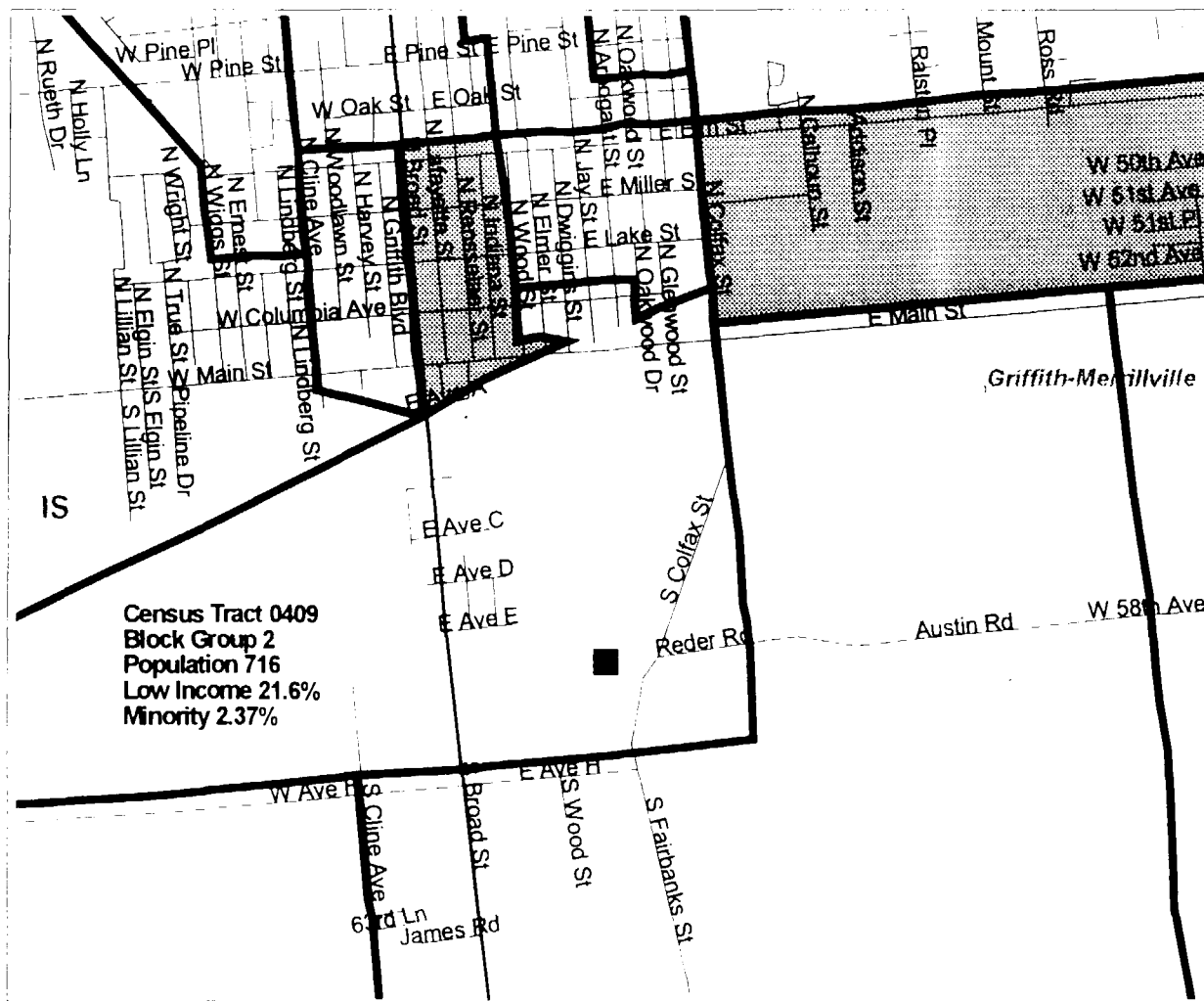
ATTACHMENT 2

U.S. ENVIRONMENTAL PROTECTION AGENCY
REMOVAL ACTIONADMINISTRATIVE RECORD
FOR
AMERICAN CHEMICAL SITE
GRIFFITH, LAKE COUNTY, INDIANAORIGINAL
FEBRUARY 17, 2000






<u>NO.</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
1	02/11/00	Ecology and Environment, Inc.	U.S. EPA	Letter Report for the American Chemical Services Site	7
2	00/00/00	Simes, W., U.S. EPA	Karl, R., U.S. EPA	Action Memorandum: Request for an Emergency Removal Action at the American Chemical Site (PENDING)	

Region 5 Superfund EJ Analysis

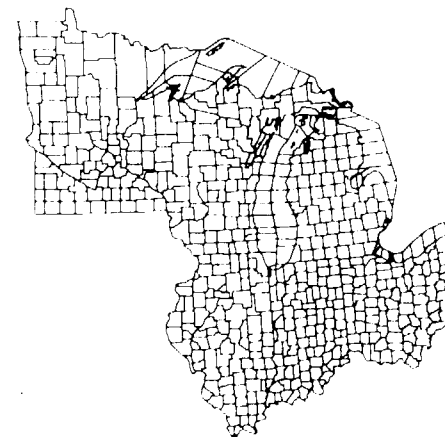
ACS Site Griffith, IN



EJ Identification

-  Low Income and Minority Less than State Average
-  Low Income or Minority at or Greater than State Average
-  Low Income or Minority 2 Times or Greater than State Average
[meets Region 5 EJ Case criteria]
-  Site Location
-  Block Group Boundary

Region 5 EJ Case Criteria for Indiana
 Minority: 20% or greater
 Low Income: 58% or greater



0 1 2 Miles

U.S. EPA Region 5
 Superfund Office

Date of Map 01/24/00

Source of Map 1990 Census Database